



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 2, 2008

By Fax

Honorable Colleen McMahon
United States District Judge
United States Courthouse
500 Pearl Street
New York, N.Y. 10007

MEMO ENDORSED

9/2/08
Matter Adjudicated to 10/1/08.
Time Excluded through
that date

Dear Judge McMahon:

The Government writes, with the consent of defendant Taylor and in consultation with Your Honor's Deputy Clerk, to adjourn the pretrial conference currently scheduled for tomorrow to October 1, 2008 at 9:30. While counsel for Mr. Taylor and counsel for the Government have discussed on numerous occasions a disposition in the case, we have not been able to finalize a plea agreement. Should we reach an agreement, we will schedule the plea before the duty magistrate.

The Government requests, with the consent of the defendant, that the time between today and the new conference date be excluded from the Speedy Trial clock to permit the parties to continue discussions of a possible resolution of the case. The Government respectfully submits that the ends of justice served by such a continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to 18 U.S.C. § 3161(h)(8)(A).

SDNY
DOCUMENT
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Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:

Jeffrey A. Brown
Assistant United States Attorney
(212) 637-1110

cc (by fax): Murray Richman, Esq.

TOTAL P.02